

GOLDENBERG, MACKLER, SAYEGH, MINTZ,  
PFEFFER, BONCHI, & GILL  
1030 Atlantic Ave.  
Atlantic City, NJ 08401  
609-344-7131  
Attorneys for Plaintiff Lyles

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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DANIELLE LYLES,	:	
	:	HONORABLE JOSEPH E. IRENAS
Plaintiff,	:	
	:	
-vs-	:	Civil Action No. 01-CV-6118 (JEI)
	:	
FLAGSHIP DEVELOPMENT CORP:	:	Civil Action
INC., et als,	:	
Defendants,	:	

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PAULINO BONDS and GLORIA :	:	
GADSON,	:	
Plaintiffs,	:	
	:	Civil Action No. 02-CV-1576 (JEI)
-vs-	:	
	:	Civil Action
FLAGSHIP DEVELOPMENT CORP:	:	
INC., et als,	:	NOTICE OF MOTION FOR FEES, INTEREST,
Defendants,	:	AND ALLOCATION OF PUNITIVE DAMAGES

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**TO:** Louis M. Barbone, Esq.  
Jacobs & Barbone, P.A.  
1125 Pacific Ave.  
Atlantic City, NJ 08401

Karen M. Williams, Esq.  
Jasinski & Williams, P.C.  
1125 Atlantic Ave.  
Suite 617  
Atlantic City, NJ 08401

Randolph Lafferty, Esq.  
Youngblood, Corcoran, et al  
3205 Fire Road  
Pleasantville, NJ 08232

PLEASE TAKE NOTICE that on the day and time set by the Court, the undersigned attorney for the plaintiff, Danielle Lyles, shall move before the Honorable Joseph I. Irenas, United States District Court Judge for the District of New Jersey, at the United States Court House, Camden, New Jersey, for:

- 1) attorneys fees,
- 2) costs,
- 3) prejudgment interest, and
- 4) an allocation of the punitive damages awarded

TAKE FURTHER NOTICE that the plaintiff, Danielle Lyles, will rely upon the Brief, Certifications, and Affidavits submitted in accordance with Court's further Order, as the trial transcript has been requested but not yet received.

TAKE FURTHER NOTICE that the plaintiff, Lyles, respectfully requests oral argument.

GOLDENBERG, MACKLER, SAYEGH, MINTZ,  
PFEFFER, BONCHI & GILL  
Attorneys for Plaintiff Lyles

  
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Mark Pfeffer, Esq.

June 23, 2004

PROOF OF MAILING

The original of the within Notice of Motion was forwarded to the Clerk of the United States District Court on June 23, 2004, via Lawyers' Service.

PROOF OF SERVICE

A copy of the within Notice of Motion was forwarded to:

Randolph Lafferty, Esquire  
Attorney for plaintiffs Paulino Bonds and Gloria Gadson  
Youngblood, Corcoran, Lafferty, Hyberg & Waldman  
3205 Fire Road  
Pleasantville, New Jersey 08232

Louis Barbone, Esquire  
Attorney for defendant Flagship Resort Development Corporation, Inc.  
Jacobs & Barbone  
1125 Pacific Avenue  
Atlantic City, New Jersey 08401

Karen Williams, Esquire  
Attorney for defendant Flagship Resort Development, Inc.  
Jasinski & Williams, P.C.  
1125 Atlantic Avenue, Suite 617  
Atlantic City, New Jersey 08401

All of the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

  
Cherry Rellosa  
Secretary to Mark Pfeffer, Esquire

Dated: June 23, 2004